



UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2022 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

MANUEL PEREZ,

Defendant.

CR No. 2:22-cr-00333-MEMF

I N D I C T M E N T

[18 U.S.C. §§ 2244(b), 7(8):  
Abusive Sexual Contact; 18 U.S.C.  
§§ 113(a)(5), 7(8): Simple Assault  
of an Individual Under the Age of  
Sixteen]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. §§ 2244(b), 7(8)]

On or about March 31, 2022, within the special maritime and territorial jurisdiction of the United States, on a foreign vessel during a voyage departing from and returning to Long Beach, California, within the Central District of California, defendant MANUEL PEREZ, a national of the United States who resided in Los Angeles County, within the Central District of California, knowingly engaged in sexual contact, as defined in Title 18, United States Code, Section 2246(3), with VICTIM 1, a national of the United

1 States, without VICTIM 1's permission, by intentionally touching,  
2 through direct contact, VICTIM 1's buttocks, with the intent to  
3 abuse, humiliate, harass, and degrade VICTIM 1, and to arouse and  
4 gratify defendant PEREZ's sexual desire.

COUNT TWO

[18 U.S.C. §§ 113(a)(5), 7(8)]

On or about March 31, 2022, within the special maritime and territorial jurisdiction of the United States, on a foreign vessel during a voyage departing from and returning to Long Beach, California, within the Central District of California, defendant MANUEL PEREZ, a national of the United States who resided in Los Angeles County, within the Central District of California, intentionally used a display of force that reasonably caused VICTIM 2, a national of the United States under the age of sixteen, to fear imminent bodily harm.

A TRUE BILL

\_\_\_\_\_/s/  
Foreperson

STEPHANIE S. CHRISTENSEN  
Acting United States Attorney



SCOTT M. GARRINGER  
Assistant United States Attorney  
Chief, Criminal Division

DAVID T. RYAN  
Assistant United States Attorney  
Deputy Chief, General Crimes  
Section

MORGAN J. COHEN  
Assistant United States Attorney  
General Crimes Section